

National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



August 21, 2009

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at an STS-128
Pre-Launch Reception hosted by Jacobs on August 23, 2009

NASA invitees, accompanied by their spouse or a guest, may attend a pre-launch reception sponsored by Jacobs at the Hilton Hotel Seashore Ballroom, Cocoa Beach, in Florida, on August 23, 2009, from 8:00 p.m.-11:00 p.m. This event will provide NASA employees the opportunity to discuss the space shuttle mission with representation from the public, academia, supplier network, and industry.

This event will be a widely-attended gathering of approximately 300 representatives of government, the aerospace industry and the community. Food and refreshments will be served at a cost of approximately \$13.50 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I have determined that free attendance at the above mentioned reception is in the interest of the agency because it will further agency programs and operations. Accordingly, NASA employees that have been invited to attend may accept free attendance at the event. They may also accept invitations for accompanying spouses or guests.

However, NASA employees whose duties may substantially affect Jacobs, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i), regarding participation in this event from their local ethics counselor.

Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009, requires signing an ethics pledge may only attend if they reimburse the sponsors the cost of the food they and any accompanying guest consume at the reception.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over a horizontal line.

Adam F. Greenstone